

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FRANK ELKINS,

Plaintiff

VS.

No. 14-cv-601-MJR-PMF

CITY OF ANNA, ANNA POLICE OFFICER
SHAWN KNUPP, UNION COUNTY AND
UNION COUNTY DEPUTY ROBERT MCGEE

Defendants.

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING PURSUANT
TO SUPREME COURT RULE 183 AND DEEMED ANSWER TIMELY FILED**

NOW Come the Defendants, Union County and Union County Deputy Robert McGee, by Bleyer and Bleyer, their attorneys, and for their Motion for Extension of Time to File Responsive Pleading Pursuant to Supreme Court Rule 183 and to deemed Answer Timely filed pursuant to FRCP 6(b), say:

1. That Plaintiff's Complaint (Doc. 2) was filed herein on May 23, 2014.
2. That this Court granted (Doc 12) these Defendants' Motion for Extension of Time to File a Response to the Complaint.
3. That due to personal and professional commitments, Attorney Joseph A. Bleyer was out of his office late in the afternoon on Friday, December 8, 2014, and was unable to file his Answer.
4. That the Answer of these Defendants was filed on Sunday December 10, 2014. (Doc 19).

5. That written discovery is not yet complete and the Scheduling Conference with Judge Frazier is set on August 14, 2014, and the Trial in the case for the presumptive Trial Month of June, 2015, and the Plaintiff is not prejudiced by allowing the Answer of the Defendants, Union County, Illinois and Robert McGee (Doc 19) to be deemed timely filed and the filing of the Answer on December 10, 2014, to be excusable neglect pursuant to FRCP 6(b).

WHEREFORE, Defendants, Union County and Union County Deputy Robert McGee, pray this Court enter an Order granting the Defendants, Union County and Union County Deputy Robert McGee, Motion for Extension of Time (Doc 20) declaring that the Defendants's Answer (Doc 19) was timely filed.

BLEYER and BLEYER
S/Joseph A. Bleyer
Attorney Registration No. 6193192
Attorneys for Defendants Union County
and Union County Deputy Robert McGee

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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2014, I electronically filed a Motion for Extension of Time to File Responsive Pleading and toe Deemed the Answer Timely filed, on behalf of Union County and Union County Deputy Robert McGee with the Clerk of the Court using CM/ECF System which will send notifications of such filing to the following:

Louis J. Meyer
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I hereby certify that on August 10, 2014, I mailed by United States Postal Service, the documents to the following nonregistered participants:

None

S/JOSEPH A. BLEYER

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